

ANTHONY GREGORY
3001 WINDSOR AVE
BALTIMORE, MD 21216

Plaintiff

v.

AM TRANS INC
13700 JABIELLE TER,
BRISTOW, VA, 20136

S/O: ADNAN AHMAD
13700 JABIELLE TER
BRISTOW, VA 20136

and

ADNAN AHMAD
13700 JABIELLE TER
BRISTOW, VA 20136

Defendants

* * * * *

* IN THE
* CIRCUIT COURT
* OF
* MARYLAND
* FOR
* BALTIMORE CITY
* CASE NO.: C-24-CV-25-001603

COMPLAINT

Plaintiff Anthony Gregory (hereinafter referred to as “Plaintiff”), by and through his attorneys, Brandon C. James, Esq., and the James Legal Group, LLC, hereby files suit against Defendants AM Trans Inc, and Adnan Ahmad (hereinafter referred to as “Defendants”) and, in support thereof, states as follows:

1. Plaintiff is now, and at all times relevant to this suit, was a resident of Baltimore City, Maryland.
2. Defendant AM Trans Inc., upon information and belief, is a Virginia corporation with it’s principle place of business in Bristow Virginia.
3. Defendant Ahmad is the owner of AM Trans Inc., and a resident of Bristow Virginia.

4. On August 7, 2024, at approximately 11:37 p.m., Plaintiff was operating a tractor trailer in a safe and responsible manner, traveling westbound on interstate 495 in Montgomery County.

5. At the aforementioned date and time, Defendant Ahmad, was driving a tractor trailer owned by Defendant AM Trans Inc. westbound on interstate 495 in Montgomery County.

6. Suddenly and without warning, Defendant Ahmad lost control of his tractor trailer, striking Plaintiff and causing significant damage.

**COUNT I – GREGORY V AHMAD
(Negligence)**

7. The allegations of fact hereinabove and below are set forth, adopted herein, and made a part hereof, and further,

8. Defendant Ahmad owed a duty to operate his vehicle in a safe and responsible manner, but negligently breached that duty by:

- a) failing to maintain a reasonable proper rate of speed;
- b) failing to maintain proper control of his vehicle;
- c) failing to keep a proper lookout;
- d) failing to keep apprised of road and traffic conditions;
- e) failing to obey the stop sign and/or traffic signal;
- f) failing to take steps necessary to avoid the collision; and
- g) in other respects, presently unknown to Plaintiff, but which may become

known prior to or at the time of trial.

9. As the direct and proximate result of Defendant Ahmad's aforesaid negligence, Plaintiff suffered serious physical injury, pain and mental distress, and property damage. Plaintiff sustained serious and, perhaps permanent injuries in and about his head, back, body, and limbs. Plaintiff was further caused to undergo extensive medical treatment for the care of said injuries.

10. All of Plaintiff's stated injuries, damages and losses, past, present, and perspective, were caused solely by the negligence of the Defendant Ahmad, with no negligence or want of due care on the part of the Plaintiff contributing thereto.

**Count II – GREGORY V AM TRANS INC.
(Respondeat Superior)**

11. Plaintiff incorporates by reference every foregoing paragraph as if fully herein.

12. Defendant Ahmad was an employee of the AM Trans Inc., on August 7, 2024, when he struck Plaintiff.

13. Defendant Ahmad committed these acts within the scope of his employment with AM Trans Inc.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, in an amount exceeding Seventy Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

Respectfully Submitted,

The James Legal Group, LLC

_____/s/_____
Brandon C. James, Esq.
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Attorney for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff does hereby demand a trial by jury on all counts.

Respectfully Submitted,

The James Legal Group, LLC

_____/s/_____
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